

COURTNEY M. GACCIONE, ESSEX COUNTY COUNSEL

By: Alan Ruddy, Esq., Assistant County Counsel

Attorney ID#002411975

Office of the Essex County Counsel

Hall of Records, Room 535, 465 Dr. Martin Luther King, Jr., Blvd., Newark, NJ 07102

(973) 621-5021

(Attorney for Defendant, County of Essex, improperly pled as Essex County  
Department of Corrections )

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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(NEWARK)**

Civil Action No.

Removed from:

:SUPERIOR COURT OF NEW JERSEY

:LAW DIVISION: ESSEX COUNTY

:DOCKET NO. ESX-L-000843-18

KERRI F. KELLERMAN,

Plaintiff,

vs.

ESSEX COUNTY DEPARTMENT  
OF CORRECTIONS, et al.

Defendants.

Civil Action

**NOTICE OF FILING PETITION  
TO UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
NEW JERSEY FOR REMOVAL  
28 U.S.C. §1446(d)**

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To: Clerk of the United States District Court  
District of New Jersey  
Martin Luther King, Jr., Courthouse  
50 Walnut Street  
Newark, NJ 07101

On Notice to: Clerk, Essex County Superior Court  
Civil Law Division Filing  
50 West Market Street, Rm. 131  
Newark, NJ 07102

Kerri F. Kellerman  
106 Harrison Street, Apt. 709  
East Orange, NJ 07018

SIR/MADAM:

PLEASE TAKE NOTICE that the defendant, County of Essex, on this      day of      ,2018, filed a Notice of Removal, a copy of which is attached hereto, in the United States District Court for the District of New Jersey, to remove the above-captioned matter from the Superior Court of New Jersey, Essex County, to the United States District Court for the District Court of New Jersey.

You are also advised that the defendants, upon filing of said Notice of Removal, filed a copy of the Notice with all counsel of whom defendants have notice has filed pleadings in this case.

Courtney M. Gaccione  
Essex County Counsel  
(Attorney for defendant,  
County of Essex)

s/Alan Ruddy  
Alan Ruddy  
Assistant County Counsel

Dated: March 21, 2018

**CERTIFICATION OF SERVICE**

I hereby certify that the original of the Notice of Petition to the Clerk of the United States District for the District of New Jersey for the Removal and the Notice of Removal were filed with Clerk of the United States District Court for the District of New Jersey, Newark Vicinage, and the Clerk of the Superior Court of New Jersey, Civil Division, and counsel of record within the time prescribed by the rules of Court.

s/Alan Ruddy  
Alan Ruddy  
Assistant County Counsel

Dated: March 21, 2018